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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DONALD R. CAMERON, *et al.*

Plaintiffs

v.

APPLE INC.,

Defendant.

Case No. 4:19-cv-03074-YGR

**JOINT STATEMENT REGARDING
REVISED PAPERS IN CONNECTION WITH
PROPOSED SETTLEMENT**

1 On November 2, 2021, the Court held a hearing on Developer Plaintiffs' Motion for
2 Preliminary Approval of Class Action Settlement with Apple Inc. (Dkt. 396). At the hearing, the
3 Court directed that certain revisions be made to the proposed notice and claim form documents
4 attached as exhibits to the August 26, 2021 Declaration of Steven Weisbrot (the "Weisbrot
5 Declaration," Dkt. 396-2) and also raised certain questions about those documents as well as the
6 Parties' Settlement Agreement attached as an exhibit to the August 26, 2021 Declaration of Steve W.
7 Berman (the "Berman Declaration," Dkt. 396-1). In accordance with the discussion at the hearing,
8 the Parties have agreed to submit the following revised versions of the proposed notice and claim
9 form documents and the Parties' Settlement Agreement, as well as a revised [Proposed] Order
10 Granting Developer Plaintiffs' Motion For Preliminary Approval of Class Action Settlement With
11 Defendant Apple Inc., which reflects the changes ordered by the Court:

12 1. Attached hereto as **Exhibit A** is a revised version of the Parties' Settlement Agreement.
13 (The prior version was attached as Exhibit A to the Berman Declaration).

14 2. Attached hereto as **Exhibit B** is a revised version of the Parties' proposed detailed Class
15 Notice. (The prior version was attached as Exhibit B to the Weisbrot Declaration).

16 3. Attached hereto as **Exhibit C** is a revised version of the Parties' proposed Email Notice.
17 (The prior version was attached as Exhibit C to the Weisbrot Declaration).

18 4. Attached hereto as **Exhibit D** is a revised version of the Parties' proposed Postcard
19 Notice. (The prior version was attached as Exhibit D to the Weisbrot Declaration).

20 5. Attached hereto as **Exhibit E** is a revised version of the Parties' proposed Claim Form.
21 (The prior version was attached as Exhibit E to the Weisbrot Declaration).

22 6. Attached hereto as **Exhibit F** is a revised [Proposed] Order Granting Developer
23 Plaintiffs' Motion For Preliminary Approval of Class Action Settlement With Defendant Apple Inc.
24 (The prior version was filed as Dkt. 395-5).

1 RESPECTFULLY SUBMITTED,

2 Dated: November 5, 2021

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E-FILING ATTESTATION

I, Steve W. Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Steve W. Berman

STEVE W. BERMAN